



The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

May 12, 2004

Mr. Peter Lyon, President
Nashua Foundries, Inc.
5 Foundry Road
Nashua, New Hampshire 03060

CERTIFIED MAIL (7099 3400 0003 0688 2355)
RETURN RECEIPT REQUESTED
LETTER OF DEFICIENCY
No. ARD 2004-004

Dear Mr. Lyons:

On December 18, 2003, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection of Nashua Foundries, Inc., ("Nashua Foundries") located in Nashua, NH. The purpose of the inspection was to determine Nashua Foundries' compliance status with State Operating Permit No. FP-S-0076 ("the Permit"), in effect January 19, 1999 through January 31, 2004, and Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution.

Per your request, on January 27, 2004, DES sent permit renewal application forms to you. To date, DES has not received the overdue permit renewal application necessary for renewal of the Permit.

This Letter of Deficiency ("LOD") is being sent to formally notify you of the deficiencies identified as a result of the inspection and subsequent file review and the necessary action to resolve them. The deficiencies are as follows:

- 1 Env-A 608.01 and Env-A 608.02(b) requires the owner or operator of any stationary source or device that has been issued a state permit to operate to submit an application 90 days prior to the designated expiration date of the current state permit to operate. On January 19, 1999, DES issued the Permit to Nashua Foundries. The Permit expired on January 31, 2004. A renewal application was not filed by October 31, 2003, and to date DES has not received a renewal application for the Permit. As such, Nashua Foundries is currently operating the Gray Iron Castings Operation without a permit, in violation of Env-608.
2. Env-A 903.03, Env-A 907.01, and Condition IX. of the Permit required Nashua Foundries to maintain records of and report the following:
 - a) daily raw material usage and phenolic resin, content of the phenolic resin sand mixture, and total suspended particulate emissions (tons);
 - b) mass of material collected by each baghouse and operating time between the collected material removal in order to calculate the TSP and PM-10 emissions from the gray iron castings operations; and
 - c) maintain a baghouse maintenance book containing records emission observations, the maintenance performed upon the baghouse, and charts showing where the maintenance or changing of the bags occurred.

At the time of the December 18, 2003 inspection, the above records were not being maintained and had not been reported to DES as required. To date, this data still has not been submitted.

3. Env-A 704.04 and Condition VIII.F of the Permit requires Nashua Foundries to submit to DES payment of the emission-based fee and a summary of the calculations referenced in Condition IX of the Permit for each calendar year by October 15th of the following calendar year. To date, Nashua Foundries has not submitted the annual emission-based fee payment or summary of calculations for calendar years 1999 through 2002.

DES believes that the above referenced deficiencies can be resolved by Nashua Foundries taking the following actions:

4. Within 45 days of receipt of this LOD, submit the application form sent by DES, via letter, to Nashua Foundries on January 27, 2004;
5. Within 45 days of receipt of this LOD, submit the records required by the Permit as specified in paragraph 2 above, for calendar years 1999 through 2002; and
6. Within 45 days of receipt of this LOD, submit to DES the annual emission reports for calendar years 1999 through 2002 as required by Env-A 907.01 and Conditions VIII and IX of the Permit so that DES may invoice Nashua Foundries for the applicable emission based fees.

DES understands that you received assistance from the Small Business Technical Assistance Program (SBTAP) in submitting the original applications. Should you need additional assistance please contact the SBTAP at (800-837-0656 or (603) 271-5629) or contact Barbara Dorfschmidt, Permit Engineer at (603) 271-6796. Either way, the permit renewal application must still be submitted within the timeframe specified above.

In addition, should you need assistance completing the annual emissions reports for emission based fees, please do not hesitate to contact the SBTAP at the number listed above, or Sonny Strickland, Emissions Inventory Supervisor at (603) 271-6283.

In the event that Nashua Foundries fails to resolve the deficiencies above and within the time periods indicated, DES may initiate further action against Nashua Foundries including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Mary Ruel, at the following address:

NHDES Air Resources Division
Compliance Bureau
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Please be advised that DES will continue to monitor Nashua Foundries compliance status and that this letter does not provide relief against any other existing or future deficiencies. It is important that Nashua Foundries be aware of all the requirements in its Permit.

Please feel free to contact DES should you have any questions regarding compliance with Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution, and the requirements of your current permit. A current copy of the rules can be obtained from the DES website at www.des.state.nh.us/Rules/air.htm, or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, please contact Mary Ruel at (603) 271-6795.

Sincerely,

A handwritten signature in black ink is written over the word "COPY" in large, bold, black capital letters. The signature appears to be "P. Monroe" with a long horizontal flourish extending to the right.

Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

cc: R. Kurowski, EPA Region 1
G. Hamel, DES Legal Unit
R. Cartier, NHDES SBTAP
B. Dorfschmidt, NHDES
AFS #3301190791